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25 *Attorneys for Defendants*

26 Cox Communications, Inc.; CoxCom, LLC; and

27 Cox Communications California, LLC

28 UNITED STATES DISTRICT COURT

ENTROPIC COMMUNICATIONS,
29 LLC,
Plaintiff,
v.
COX COMMUNICATIONS, INC.;
COXCOM, LLC; and COX
COMMUNICATIONS CALIFORNIA,
LLC,
Defendants.

Lead Case: 2:23-cv-01049-JWH-KES
Related Case:
2:23-cv-1050-JWH-KES

**DECLARATION OF COURTNEY S.
DABBIERE IN SUPPORT OF COX
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
LEAVE TO AMEND AND
SUPPLEMENT COMPLAINT AND
INFRINGEMENT CONTENTIONS**

1 I, Courtney S. Dabbiere, state as follows:

2 1. I am an attorney admitted to practice *pro hac vice* in the Central
3 District of California. I am a Senior Associate at Kilpatrick Townsend & Stockton
4 LLP and counsel to Cox Communications, Inc., CoxCom, LLC, and Cox
5 Communications California, LLC's (collectively, "Cox"). I have personal
6 knowledge of the facts set forth herein, and if called upon to testify, could and
7 would testify competently thereto.

8 2. I make this declaration in support of Cox's Opposition to Plaintiff's
9 Motion for Leave to Amend and Supplement Complaint and Infringement
10 Contentions ("Opposition").

11 3. I attended the parties' meet and confer on November 1, 2023. During
12 the meet and confer, Entropic reserved the right to add more to-be-issued
13 continuation patents to this case at least through the *Markman* process and refused
14 to identify a time or event it considered appropriate for the parties to discuss
15 narrowing the number of asserted claims or asserted patents.

16 4. Attached hereto as Exhibit A is a chart comparing the proposed
17 asserted claims of U.S. Patent No. 9,866,438 and the asserted claims of U.S. Patent
18 No. 10,135,682 and a chart comparing the proposed asserted claims of U.S. Patent
19 No. 11,785,275 and the asserted claims of U.S. Patent Nos. 9,210,362, 11,399,206,
20 and 11,381,866.

21 5. Attached hereto as Exhibit B is a true and correct copy of the Issue
22 Notification dated September 20, 2023, for U.S. Patent No. 11,785,275.

23 6. Attached hereto as Exhibit C is a true and correct copy of Entropic's
24 Disclosure of Asserted Claims and Infringement Contentions served on September
25 15, 2023.

26 7. Attached hereto as Exhibit D is a true and correct copy of the rough
27 transcript from the hearing held before Special Master Keyzer on December 20,
28 2023.

8. Attached hereto as Exhibit E is a true and correct copy of Cox's Letter to Special Master Keyzer regarding Entropic's infringement contentions dated November 17, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 26, 2023

By: /s/ Courtney S. Dabbiere
Courtney S. Dabbiere

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